

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Dongguan Cheng One Co., Ltd.,

Judgment creditor,

-against-

Desen Inc.,

Judgment debtor.

Civil Action No.: 1:24-cv-03388-ER

**Information Subpoena and Subpoena
Duces Tecum**

To: (Via Certified Mail)

Desen Inc.
99-03 43rd Avenue, Corona, Queens, New York 11368, United States of America
10312 51st Avenue, Corona, Queens, New York 11368, United States of America
1407 Broadway, Suite 3412, New York, New York 10018, United States of America

Greetings:

WHEREAS, in an action in the UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK (the “Court”), by and between the Plaintiff Dongguan Cheng One Co., Ltd., and the Defendant Desen Inc., a judgment was entered in favor of Plaintiff Dongguan Cheng One Co., Ltd. (the “Judgment Creditor”) and against Defendant Desen Inc. (the “Judgment Debtor”), on 1/22/2025, for “(a) \$873,260 for the unpaid goods sold by Dongguan Cheng One Co., Ltd. to Desen Inc.; and (b) for prejudgment interest at the statutory rate from the due dates of invoices, plus costs and disbursements of \$519.79,” for a total sum of \$873,779.79, which amount, together with interest thereon from the date of the judgment, remains due and unpaid, and which judgment was filed in the Court on 1/22/2025;

WHEREAS, the company to which this subpoena is directed maintains a registered address of business in Queens County, New York; and

WHEREAS, the person to whom this subpoena is directed is or was a member, director, or officer of the Judgment Debtor;

NOW THEREFOR, WE COMMAND YOU that you answer in writing under oath, separately and fully, each question in the questionnaire accompanying this subpoena, each answer referring to the question to which it responds, and that you return the answers together with the original questions within seven days after your receipt of the questions and this subpoena.

NOW THEREFOR, WE FURTHER COMMAND YOU to provide the documents listed in Schedule “A” to the accompanying questionnaire.

TAKE NOTICE that this is an attempt to collect a debt and any information obtained from you will be used for that purpose.

TAKE FURTHER NOTICE that false swearing or failure to comply with this subpoena is punishable as a contempt of court.

Dated: New York, New York
March 28, 2025

MAZZOLA LINDSTROM, LLP



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Attorneys for Judgment Creditor

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Dongguan Cheng One Co., Ltd.,
Judgment creditor,
-against-
Desen Inc.,
Judgment debtor.

Civil Action No.: 1:24-cv-03388-ER

**Questions and Answers in Connection
with Information Subpoena**

To: (Via Certified Mail)

Desen Inc.
99-03 43rd Avenue
Corona, New York 11368, United States of America

I represent Desen Inc., the recipient of an information subpoena herein and of the original and a copy of questions accompanying said subpoena. The answers set forth below are made from information within my knowledge or obtained from the records of the “Judgment Debtor” Desen Inc.

QUESTION NO. 1: Provide the names and addresses of each person who participated in the drafting of the answers to these questions.

QUESTION NO. 2: List the names and contact information for all members, directors, and officers of the Judgment Debtor.

QUESTION NO. 3: List the names, addresses and telephone numbers of all individuals having an ownership interest in the Judgment Debtor.

QUESTION NO. 4: List the names, addresses and account numbers of all bank accounts on which the name Desen Inc. appears or has appeared since January 1, 2020.

QUESTION NO. 5: What are Desen Inc.'s Employment Identification Numbers (EIN)? If they do not have their own EIN, does they operate under another entity's EIN, and, if so, what is the name of that entity and what is that entity's EIN?

QUESTION NO. 6: Provide the names, title, and contact information of each accountant, bookkeeper, or tax or financial advisor who has provided services to the Judgment Debtor since January 1, 2020.

QUESTION NO. 7: Identify each debt, including all accounts receivable, owed to the Judgment Debtor. Provide the name and address of the debtor and the amount owed.

QUESTION NO. 8: Does the Judgment Debtor receive money from any of the following sources? If yes, list the amount, how often, and the name and address of the source in the following format: Type, Amount, and Frequency of Payments, Name & Address of Sources.

Loan Payments:

Yes: _____ No: _____

Rental Income:

Yes: _____ No: _____

Bank Interest:

Yes: _____ No: _____

QUESTION NO. 9: Does the Judgment Debtor maintain a security interest in any collateral valued in excess of \$1,000.00?

Yes: _____ No: _____

If yes, list the type of collateral, the owner of the collateral, the approximate value of the collateral, the circumstances under which the Judgment Debtor has been given a security interest in the collateral, and the location of the collateral.

QUESTION NO. 10: Set forth all other judgments that you are aware of that have been entered against the Judgment Debtor and include: Creditor's Name, Name of Attorney, Amount Due, and Court Index Number.

QUESTION NO. 11: With regard to the property formerly leased by Judgment Debtor, located at 1407 Broadway, Suite 3412, New York, NY 10018, identify whether the entity now leasing that address is affiliated with the Judgment Debtor, and if so, state the nature of the relationship between the Judgment Debtor and that entity.

I affirm this ____ day of _____, _____, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

(PRINT OR TYPE NAME)

Schedule A

Definitions and Instructions

- (1) The word “documents” is used in the broadest possible sense and includes, but is not limited to, any handwritten, typewritten, printed, transcribed, impressed, recorded, graphic, or other matter whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, films (including microfilm or microfiche), computer storage devices or any other medium and shall include, but not be limited to, matter in the form of books, reports, accounts, memoranda, studies, statements, speeches, transcripts, notebooks, agreements, notes, summaries, correspondence, telephone logs, tape recordings, desk calendars, diaries, day books, drafts, contracts, agreements, fax transmittals and confirmations, articles, journals, financial records, work papers or any other form of visual or aural recordation in your actual or constructive possession, custody or control, or of which you have knowledge, whether prepared, published or released by you or by any other person or entity. Without limiting the foregoing, any document which includes notations, insertions, marginal notes or other variations shall be considered a separate document.
- (2) The words “and” and “or” shall be construed either disjunctively or conjunctively as is necessary to bring within the scope of the specification all responses that might otherwise be construed to be outside the scope.
- (3) Reference to the singular includes the plural, and vice versa, except where the context clearly requires otherwise. References to masculine gender include feminine gender and vice versa.
- (4) The term “referring or relating to” means concerning, evidencing, referring to, relating to, arising from, connected with, commenting on, responding to, showing, describing, analyzing, reflecting or constituting.
- (5) If a document otherwise responsive to this demand is withheld on the ground of privilege, furnish a list identifying the request for which the document is being withheld and specify: (a) the type of privilege asserted; (b) the basis upon which the privilege is claimed; (c) the document withheld, including (i) the date of the document, (ii) a description of the subject matter of the document, (iii) the name(s) and address(es) of each person who prepared, discussed, received, viewed or otherwise possessed or controlled the document.
- (6) If a document otherwise responsive to this demand has been lost or destroyed, so state and identify the request to which the document relates and specify (a) the subject matter and substance of the document; (b) the date of the document; (c) the name(s) and address(es) of each person who prepared, discussed, received, viewed or otherwise possessed or controlled the document; and (d) the date, place, manner, reason and circumstances of said loss or destruction.

- (7) The documents called for by this demand shall be produced as they have been kept in the usual course of business.
- (8) The time period covered by this document request, unless otherwise noted, is January 1, 2019 to the present.
- (9) References to the Judgment Debtor shall mean Desen Inc. and also include any affiliates, predecessors to, or successors-in-interest of the Judgment Debtor.

Documents to be Produced

You are required to produce true and correct copies of the following:

1. All bank or other financial account statements of the Judgment Debtor, including, but not limited to, canceled checks, check book registers, general ledger, savings account passbooks, certificates of deposit, deposit receipts, and all other documents concerning accounts in which the Judgment Debtor has or had any interest since January 1, 2020.
2. Records relating to the location and contents of any safe deposit box in which the Judgment Debtor has or had any interest or has had access since January 1, 2020.
3. Documents concerning any real estate (including any interest in a cooperative housing corporation) owned or leased in whole or in part by Judgment Debtor since January 1, 2020.
4. All stock, partnership, assumed name, or d/b/a certificates, or any other documents concerning any business or other activity from which Judgment Debtor has derived income since January 1, 2020.
5. Produce the K1s of the Judgment Debtor for the years 2020 through 2025.
6. All titles, registrations, or other documents evidencing or concerning any automobiles, boats, planes, or other vehicles or machinery owned the Judgment Debtor, and any affiliated company, since January 1, 2020.
7. Monthly credit card, debit card, or other credit line or debit account statements (including corporate or business cards) for any card used for by any member, director, officer or employee of the Judgment Debtor with respect to the business of the Judgment Debtor since January 1, 2020.
8. Copies of all contracts or other agreements to which the Judgment Debtor is a party, since January 1, 2020.
9. Documents concerning any sale or assignment of any assets of the Judgment Debtor since January 1, 2020.

10. Appraisals or any other documents concerning any real property or chattel property owned by the Judgment Debtor (having a value of \$100 or more per item or collection), or in which the Judgment Debtor has had an interest, since January 1, 2020.

11. All financial statements, loan applications, or any similar document executed by, or issued by, the Judgment Debtor since January 1, 2020.

12. Documentation identifying the Judgment Debtor and/or its affiliates.

13. Documents concerning the transfer of assets of Judgment Debtor.

14. Documents concerning cash and cash equivalents held in the name or for the benefit of Judgment Debtor.

15. Documents concerning the liabilities of Judgment Debtor, including but not limited to, credit card statements.

16. Documents concerning the direct or indirect ownership or other interest (including, but not limited to, contingent interests) of Judgment Debtor in other assets or entities.

17. Documents concerning the direct or indirect interests of Judgment Debtor in real property, including, but not limited to, ownership, leasehold or other interests in commercial or residential real property, as may be reflected in deeds, trusts, leases or shares in cooperative corporations.

18. Documents concerning the interest of Judgment Debtor in personal property including, but not limited to, fine and decorative art, collectibles (including, but not limited to coins, stamps, and other property for which there is a market among collectors), furniture, jewelry (including, but not limited to, watches), gems (cut and uncut), precious metals, weapons automobiles, aircraft, watercraft, livestock (including thoroughbred or other racing horses), books, musical instruments, rugs, tapestries, and textiles.

19. Documents concerning other assets of Judgment Debtor, including but not limited to, debts or obligations owed to Judgment Debtor in the form of mortgages, promissory notes, and other instruments.

20. All other documents concerning property or assets not referred to above in which Judgment Debtor has a direct or indirect ownership interest.

21. Documents sufficient to identify the location or business address of Judgment Debtor.